

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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JOHN DOE,

Plaintiff,

v.

SEAN COMBS, DADDY’S HOUSE
RECORDINGS INC., CE OPCO, LLC d/b/a
COMBS GLOBAL f/k/a COMBS ENTERPRISES
LLC, BAD BOY ENTERTAINMENT HOLDINGS,
INC., BAD BOY PRODUCTIONS HOLDINGS,
INC., BAD BOY BOOKS HOLDINGS, INC., BAD
BOY RECORDS LLC, BAD BOY
ENTERTAINMENT LLC, BAD BOY
PRODUCTIONS LLC, AND ORGANIZATIONAL
DOES 1-10,

Defendants.
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Case No. 24-CV-07772 (JPO)

ORAL ARGUMENT REQUESTED

NOTICE OF MOTION

PLEASE TAKE NOTICE that upon the accompanying memorandum of law, the Declaration of Mark Cuccaro, dated March 11, 2025, the exhibit annexed thereto, and upon all prior proceedings had in herein, Defendants Sean Combs, Daddy’s House Recordings Inc., CE OpCo, LLC d/b/a Combs Global f/k/a Combs Enterprises, LLC, Bad Boy Entertainment Holdings, Inc., Bad Boy Productions Holdings, Inc., Bad Boy Books Holdings, Inc., Bad Boy Entertainment LLC, and Bad Boy Productions LLC (collectively, the “Combs Defendants,” and excluding Mr. Combs, the “Company Defendants”) will move this Court, in accordance with Fed. R. Civ. P. 12(b)(6), before the Honorable J. Paul Oetken at the Thurgood Marshall United States Courthouse, Courtroom 706, 40 Foley Square, New York, New York 10007, for an order dismissing with prejudice: (1) Plaintiff’s Complaint (ECF #1) against the Company Defendants and (2) Plaintiff’s claim under New York City’s Gender Motivated Violence Law against all Combs Defendants.

Dated: March 11, 2025
New York, New York

SHER TREMONTE LLP

/s/ Mark Cuccaro

Mark Cuccaro

Michael Tremonte

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